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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOYCE SIRIANNI,

CASE NO.: 2:20-cv-00118-KJD-EJY

Plaintiff,

**STIPULATION AND [PROPOSED
ORDER] FOR EXTENSION OF TIME
TO FILE RESPONSE TO OPPOSITION
TO PLAINTIFF'S MOTION TO
REMAND**

ALLIED WORLD INSURANCE
COMPANY, a New York company;
DEMETRIOS A. DALACAS, ESQ.,
individually; DEMETRIOS A.
DALACAS, ESQ., P.C., a Nevada
professional corporation; DOES I-X and
ROE CORPORATIONS I-X, inclusive.

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff/Counterdefendant JOYCE SIRIANNI, through her counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and Defendant/Counterclaimant ALLIED WORLD INSURANCE COMPANY, through its counsel of record, Chad C. Butterfield of WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, that the deadline for Plaintiff to file her Response to Defendant ALLIED WORLD INSURANCE COMPANY's Opposition to Plaintiff's Motion to



1 Remand (ECF No. 17) shall be extended by seven (7) days, from March 27, 2020 to April
2 3, 2020. The Motion was filed on February 14, 2020. This proposed Stipulation and
3 Order is submitted in accordance with LR IA 6-1

4 Plaintiff respectfully requests this brief extension of time to file her response. The
5 ongoing concerns related to the COVID-19 pandemic and restrictions imposed on social
6 gathering have impacted the operations of the undersigned counsel's office. Specifically,
7 there were some unforeseen delays that resulted while Plaintiff's counsel secured remote
8 access for staff members to simultaneously work from home. Accordingly, the parties
9 respectfully request this Court to approve the foregoing stipulation as their requested
extension is not made in bad faith or to unnecessarily delay these proceedings.

10 DATED this 27th day of March, 2020.

DATED this 27th day of March, 2020

11 **PRINCE LAW GROUP**

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

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13
14 /s/ Dennis M. Prince
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28 /s/ Chad C. Butterfield
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Allied World Insurance Company

ORDER

IT IS SO ORDERED.

DATED this 2nd day of April, 2020.



UNITED STATES DISTRICT JUDGE